

8/8/23, 2:46 PM

The Law Offices Of Avrum J. Rosen, PLLC Mail - FW: Brickchurch- Bankruptcy Counsel



Avrum Rosen &lt;arosen@ajrlawny.com&gt;

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**FW: Brickchurch- Bankruptcy Counsel**

1 message

**Mathew Kabatoff** <mkabatoff@ltbholding.com>

Tue, Aug 8, 2023 at 9:55 AM

To: Avrum Rosen &lt;arosen@ajrlawny.com&gt;

Cc: Louise Blouin &lt;lt@ltbholding.com&gt;

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**From:** Allerding, John <[John.Allerding@thompsonhine.com](mailto:John.Allerding@thompsonhine.com)>**Sent:** Monday, August 7, 2023 21:45**To:** Camisha Simmons <[camisha@simmonslegal.solutions](mailto:camisha@simmonslegal.solutions)>; Louise Blouin <[lt@ltbholding.com](mailto:lt@ltbholding.com)>**Cc:** John Isbell <[john@jfi-law.com](mailto:john@jfi-law.com)>; Mathew Kabatoff <[mkabatoff@ltbholding.com](mailto:mkabatoff@ltbholding.com)>; Messinger, Brett L. <[BLMessinger@duanemorris.com](mailto:BLMessinger@duanemorris.com)>; David M. Hryck <[David.Hryck@hklaw.com](mailto:David.Hryck@hklaw.com)>; Charles Andros <[charlesandros@baypointadvisors.com](mailto:charlesandros@baypointadvisors.com)>**Subject:** RE: Brickchurch- Bankruptcy Counsel

Ms. Blouin,

I am writing to again remind you that you have been removed as an officer and/or director of Brickchurch Enterprises, Inc. ("Brickchurch"). As a result, you do not have authority to take action on behalf of Brickchurch as an officer or director.

Your statement that you are the shareholder of Aberdeen BVI is simply inaccurate. Brickchurch Holdings (BVI) Ltd. is the beneficial owner of the shares of Brickchurch. Bay Point is the sole shareholder of record and, as the sole shareholder of record, is the only party that is entitled to take shareholder action on behalf of Brickchurch.

We are in the process of filing a motion that will ask the Court to determine that you have been rightly removed as an officer and director of Aberdeen Enterprises, Inc. ("Aberdeen") and that Aberdeen Holdings( BVI) Ltd. was rightly removed as the shareholder of record. You will then have the ability to make your arguments (if any) to the Court.

Ms. Simmons, I understand that Ms. Blouin's actions are putting you in a difficult spot. As I noted above, Bay Point is in the process of filing a motion in the Aberdeen bankruptcy case to put these issues before the Court. I expect those papers to be filed tonight. We are going to ask for an expedited hearing to have the issues addressed at the Court's earliest convenience. Given that these cases are affiliated and the issues are exactly the same for both Brickchurch and Aberdeen, we will ask that the Court enter orders in both cases.

Thank you,

John

**John C. Allerding | Thompson Hine LLP**

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**From:** Camisha Simmons <[camisha@simmonslegal.solutions](mailto:camisha@simmonslegal.solutions)>**Sent:** Monday, August 7, 2023 2:09 PM**To:** Allerding, John <[John.Allerding@thompsonhine.com](mailto:John.Allerding@thompsonhine.com)>**Cc:** John Isbell <[john@jfi-law.com](mailto:john@jfi-law.com)>; Louise Blouin <[lt@ltbholding.com](mailto:lt@ltbholding.com)>; Mathew Kabatoff <[mkabatoff@ltbholding.com](mailto:mkabatoff@ltbholding.com)>;  
Messinger, Brett L. <[BLMessinger@duanemorris.com](mailto:BLMessinger@duanemorris.com)>; David M. Hryck <[David.Hryck@hklaw.com](mailto:David.Hryck@hklaw.com)>; Charles Andros  
<[charlesandros@baypointadvisors.com](mailto:charlesandros@baypointadvisors.com)>**Subject:** Brickchurch- Bankruptcy Counsel**CAUTION EXTERNAL EMAIL**

John,

I received the below request from Louise with respect to debtor's counsel to Brickchurch. I'm fine with a change of counsel if that is what needs to be done. Thanks.

CAMISHA IT IS TIME TO MOVE ON I AM THE SHAREHOLDER AND YOU ARE NOT REPRESENTING THE INTEREST OF BRICKCHURCH

THE REST IS MY BUSINESS

WE CAN NOT AFFORD TO PAY MORE LAWYERS I AM SURE YOU UNDERSTAND THIS

**Camisha L. Simmons** |Managing Member

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